

EXHIBIT 101

Declaration of Lindsay-Rae McIntyre

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF LINDSAY-RAE MCINTYRE

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I, Lindsay-Rae McIntyre, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I graduated from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill” or the “University”) in 1997. I received my Master of Business Administration from Duke University in 2004.

2. I am originally from Canada.

3. I am the Human Resources Vice President and Chief Diversity Officer at IBM. During my tenure at IBM, I have lived in Dubai and in Singapore.

Experience at UNC-Chapel Hill

4. At UNC-Chapel Hill, I had the benefit of learning from and interacting with individuals from different backgrounds both in class and outside of the classroom. Prior to attending the University, I had never been to North Carolina, but I learned a tremendous amount during my time at UNC-Chapel Hill.

5. I lived in Carmichael Residence Hall and benefited from the UNITAS program. UNITAS is a residence floor that is designed to expose students to sociocultural diversity. Through an application process students that are accepted commit to helping students discover similarities through differences. UNITAS works to challenge stereotypes and prejudice based on identities such as gender, race, nationality, religion, and sexual orientation. The floor had many diverse students and was like the

United Nations, both in the residence hall and on campus. At that time, there was little global presence on campus – this was a beacon of light imagined by the University.

6. I was a Morehead Scholar at UNC-Chapel Hill. The Morehead experience, in particular, provided me with the skill set, and courage and confidence to navigate rough waters. I learned core skills, including resiliency, creativity, crisis navigation, and relationship-building, that have served me since.

7. While I was a student, UNC-Chapel Hill brought numerous speakers to campus, including Gloria Steinem, Cornel West, and Amy Tan. These speakers were role models that inspired all of the students, regardless of our backgrounds.

8. At UNC-Chapel Hill, I was the Vice President of the student body. In this role, I had the opportunity to understand how a diverse student body allowed UNC-Chapel Hill to be a compelling force for the State.

9. With the support of the Morehead Program, I had the opportunity to write my honors thesis and do research for a Deaf School outside Harare, Zimbabwe. One of the memorable moments from the trip was being the first white person an African toddler had ever seen. I also had the opportunity to visit my roommate's hometown in rural North Carolina, where her father was the town postman and a pig farmer. My travels in North Carolina were as instructive as my trip to Zimbabwe. Both experiences developed my cultural acumen and my ability to navigate foreign spaces.

10. UNC-Chapel Hill has become significantly more diverse and inclusive since I graduated, indicating its commitment to growing competitive leaders and citizens for the world beyond UNC-Chapel Hill

The Benefits of Diversity in the Private Sector

11. IBM has been committed to diversity and inclusion for over a century. IBM knows that diverse teams fuel innovation in any industry and consistently outperform homogeneous teams.
12. Leading in difficult times is challenging. Companies have to navigate uncharted waters in this global and dynamic business world. If businesses do not have diverse talent across their markets and industries they will be blindsided by the competition.
13. Individuals who develop in homogeneous environments are far less competitive as leaders. The ability to relate to and grow people from different backgrounds is an essential differentiator in today's business world. Leadership is increasingly earned, not granted, through followership and inclusion. The workforce today wants leaders who are authentic and demonstrate a genuine interest. If a leader is not curious about people's backgrounds, and does not have the skill to unleash discretionary effort, employees will chose to work elsewhere.
14. IBM does business in 170 countries across all major industries. We are as diverse as the markets we serve. We need that diversity to drive innovation and form credible, trusting business relationships. When we are recruiting, it is no longer enough for a candidate to be an incredible scholar. There are plenty of high-performing and smart students; we are looking for candidates who are curious, self-starters, and possess the ability to lead their peers. The most competitive candidates must have an inclusive, global mindset.

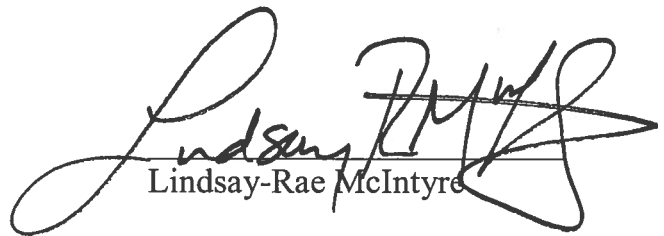
Conclusion

15. I have spent a lot of time outside of the United States. In comparison to other countries, such as India, America is a homogenous environment. American graduates have to be competitive in the world, and students cannot do that if they do not have the ability to grow, test and exercise their leadership muscles during their undergraduate experience. In order for UNC-Chapel Hill to graduate competitive, compelling future workers, the University has to provide a learning environment that develops global leaders. It cannot be incumbent on companies to grow graduates; this leadership formation must occur during their undergraduate career.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on:

July 10, 2017


Lindsay-Rae McIntyre